

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANDREW DELANCEY,

Plaintiff,

-against-

JUSTIN WELLS, FOX CORPORATION,
and FOX NEWS NETWORK, LLC

Defendants.

Case No. 1:23-CV-10357(AT)

**DEFENDANT FOX NEWS NETWORK, LLC'S
NOTICE OF MOTION AND MOTION FOR PROTECTIVE ORDER**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion for Protective Order and Declaration of Krissy Katzenstein in support of Motion for Protective Order and exhibits thereto, Defendant Fox News Network, LLC (“Fox News”), by and through its undersigned counsel, will and hereby does move this Court for a protective order, pursuant to Federal Rule of Civil Procedure 26(c)(1)(A), confirming that Fox News has responded fully to certain of Plaintiff’s written discovery requests (Interrogatories 11-14, 16-18; Requests for Production 7, 9, 12, 27-29, 30-35, 37-39, 41, 48-64, and 72-28).

PLEASE TAKE FURTHER NOTICE that, pursuant to this Court’s Order of February 21, 2025 (ECF Dkt. 57), Plaintiff’s Opposition brief is due on March 14, 2025, and a Case Management Conference is set for March 27, 2025 at 02:00 PM in Courtroom 17D, 500 Pearl Street, New York, NY 10007.

Dated: New York, New York
February 28, 2025

PAUL HASTINGS LLP

/s/ Krissy A. Katzenstein

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